



May 5, 2014

Ms. Yvonne Jamison
Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20006

RE: Request for Comments on the Environmental Goods Agreement -- Docket No. USTR-2014-0004

Dear Ms. Jamison,

I am writing on behalf of the International Wood Products Association (IWPA) to provide comments to the Office of the United States Trade Representative on an [Environmental Goods Agreement](#), 79 Fed. Reg. 17637 (March 28, 2014).

IWPA was pleased to learn that on January 24, 2014, the U.S. joined with Australia, Canada, China, Costa Rica, the European Union, Hong Kong, Japan, Korea, New Zealand, Norway, Singapore, Switzerland, and Chinese Taipei in issuing a joint statement announcing interest in negotiating an agreement to eliminate tariffs on environmental goods. We are hopeful that these negotiations will build upon the earlier list of 54 items endorsed by the Asia Pacific Economic Cooperation (APEC) forum on trade in environmental goods, which included bamboo flooring as a green good eligible for tariff reduction or elimination.

In addition to the fourteen nations that have already agreed to participate in negotiations towards an agreement on environmental goods, we support efforts by the United States and the other negotiating nations to work diligently to bring additional nations into this agreement. While the fourteen nations that have already agreed to participate represent a majority of global trade in environmental goods, we believe it is also important to attract those nations that supply many of the raw materials and intermediate goods that are critical to global commerce.

We also support inclusion of wood and wood products from certified sustainably managed forests as an environmental good under the agreement.

HTS Code

HTS Chapter 44, Wood and Articles of Wood; Wood Charcoal

Additional description

Wood and wood products from sustainably managed forests

Remarks / Environmental benefits

Wood is a renewable resource. The life cycle carbon emissions of wood products are extremely low, as trees absorb carbon dioxide from the atmosphere. Wood often serves as an alternative to other materials that require significant energy inputs. Sustainability can be shown in a variety of manners. For example certification programs, including the national programs of the Programme for the Endorsement of Forest Certification such as the Sustainable Forestry Initiative, PEFC Sweden, and the Malaysian Timber Certification Scheme, international programs such as the Forest Stewardship Council, and others, have been developed to certify that wood has been sourced from producers utilizing sustainable forest management practices and could be relied upon to determine eligibility.

By way of background, IWPA is the leading international trade association for the North American imported wood products industry, representing 200 companies and trade organizations engaged in the import of hardwoods and softwoods from sustainably managed forests in more than 30 nations across the globe. Association members consist of three key groups involved in the import process: U.S. importers and consuming industries, offshore manufacturers and the service providers that facilitate trade.

Please do not hesitate to contact IWPA (703-820-6696; Cindy Squires at cindy@iwpawood.org or Joe O'Donnell at joe@iwpawood.org) if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads "Cindy L. Squires". The signature is fluid and cursive, with the first name "Cindy" being more prominent.

Cindy L. Squires, Esq.
Executive Director